

## **EXHIBIT J**

Bryson, Santana and Joshua v. Rough Country, LLC

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
GAINESVILLE DIVISION

SANTANA BRYSON and JOSHUA )  
BRYSON, as Administrators of )  
the Estate of C.Z.B., and )  
as surviving parents of )  
C.Z.B., a deceased minor, )

Plaintiffs, )

vs. )

ROUGH COUNTRY, LLC, )

Defendant. )

CIVIL ACTION FILE

NO. 2:22-cv-17-RWS

VIDEOTAPED DEPOSITION OF  
WESLEY D. GRIMES  
May 9, 2024  
10:17 a.m.

Weinberg Wheeler Hudgins Gunn & Dial  
3344 Peachtree Road, NE  
Suite 2400

Atlanta, Georgia

Reported by: Marsi Koehl, CCR-B-2424

1 Schmoker, but I don't think he -- I -- I haven't gone  
2 through this, so I don't know what it is, but he may  
3 show up. I don't think he does, but I don't know.

4 Q. So not counting Mr. --

5 A. -- Schmoker, yeah, yeah. S-C-H -- Schmoker,  
6 yeah.

7 Q. Not counting Mr. Schmoker, I count 16 people  
8 from your office billed to this matter.

9 Does that sound about right?

10 A. If that's the count.

11 Q. It wouldn't surprise you if you had a team  
12 of 16 people working on this case?

13 A. No.

14 Q. And of those I count -- well, strike that.

15 I count eight engineers, not including  
16 yourself. Does that surprise you?

17 A. That's probably right.

18 Q. It sounds right to you that eight engineers  
19 were working on this matter?

20 A. Well, assisted. Yeah.

21 Q. Assisted in this matter?

22 A. Yeah.

23 Q. All right. Do you still have the invoices  
24 in front of you?

25 A. I do.

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CERTIFICATE

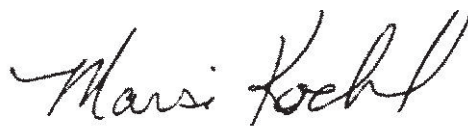
STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the colloquies, questions, and answers were reduced to typewriting under my direction; that the transcript is a true and correct record of the evidence given upon said proceeding.

I further certify that I am not a relative or employee or attorney of any party, nor am I financially interested in the outcome of this action.

This the 5th day of June, 2024.



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Marsi Koehl, CCR-B-2424